



September 26, 2016

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: *Technology Transitions* (GN Docket No. 13-5)

Dear Ms. Dortch:

On September 22, 2016, Diane Holland and Robert Mayer of the USTelecom Association and other representatives from AT&T, CenturyLink, and Verizon, met with staff from the FCC's Wireline Competition and Public Safety and Homeland Security Bureaus to discuss certain requirements in the above-referenced proceeding that incumbent providers seeking to discontinue a legacy voice service and replace it with a new service must meet.¹ In addition to explaining how the option for providers to demonstrate compliance with the latency benchmark described in Appendix B of the Second Report and Order is not feasible for use with incumbent providers' managed voice services, we provided to staff the attached handout titled, "Technology Transition Second Report and Order: Concerns with Network Performance Testing Methodology."

Please do not hesitate to contact the undersigned if you have questions or concerns.

Sincerely,

Diane Griffin Holland
Vice President, Law & Policy

Attachment

cc: Michele Berlove
Megan Capasso
Alex Johns
Carol Matthey
Peter Saharko
Jeffrey Goldthorp

¹ See Ex Parte Letter from Diane Griffin Holland, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-5 (filed Sep. 23, 2016).

Technology Transition Second Report and Order:

Concerns with Network Performance Testing Methodology

September 22, 2016

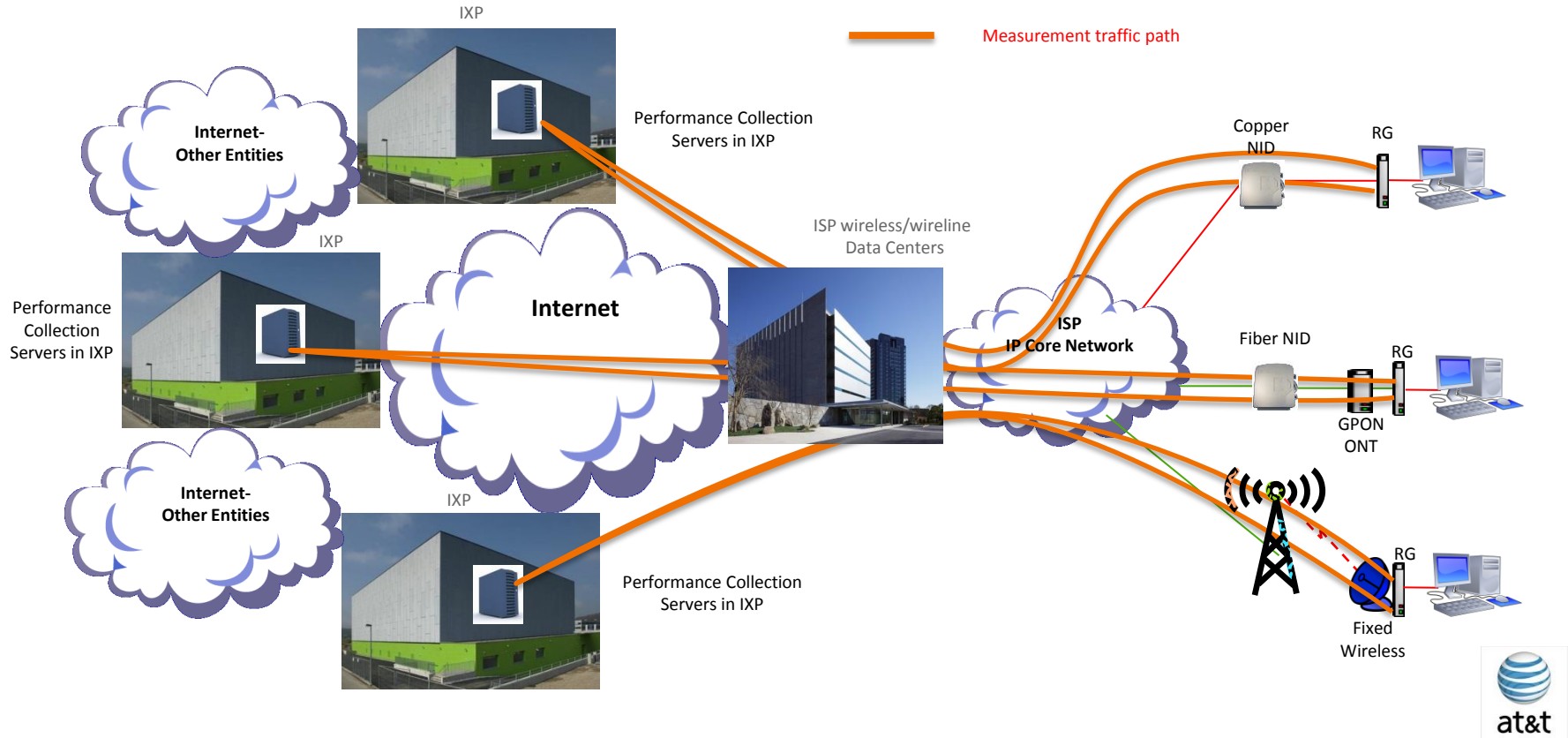


Concerns with Network Performance Testing Methodology

- The recent Tech Transition Order allows carriers to use CAF II testing methodology that will measure download/upload speeds and latency between the customer location and Internet Exchange Point (IXP)
- CAF II latency measurements are designed to ensure the suitability of government funded broadband services for Over-The-Top VoIP applications if the customer chose to use services like Vonage or skype
- ILEC voice replacement services are generally native/managed VoIP or wireless services
- IXPs are not in the call path of native/managed VoIP or wireless services
- Calls originating on one carrier's network and terminating on another's utilize managed interconnection
 - IXPs are still not in the path of the call
- The replacement service latency requirement should be:
 - Per ITU G.114, 200ms mouth-to-ear for On-Net calls
 - For Off-Net calls, 100ms between user device and PSTN media gateway or the peering point with the directly interconnected VoIP service provider.
- It is impractical to conduct continuous testing on a subscriber's voice line 24x7 for 30 days, as the subscriber would have no use of their service during that entire period



CAF II Measurement Path



VoIP and CMRS Call Paths

It is technically infeasible to implement the testing methodology set forth in Appendix B for managed VoIP or CMRS, as neither service has connectivity to an Internet Interexchange Point.

